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38 ORACLE AMERICA, INC.

29 UNITED STATES DISTRICT COURT
30 NORTHERN DISTRICT OF CALIFORNIA
31 SAN FRANCISCO DIVISION

32 ORACLE AMERICA, INC.
33 Plaintiff,
34 v.
35 GOOGLE INC.
36 Defendant.

37 Case No. CV 10-03561 WHA
38 **ORACLE'S RESPONSE TO ECF NO.**
39 **1548**
40 Dept.: Courtroom 8, 19th Floor
41 Judge: Honorable William H. Alsup

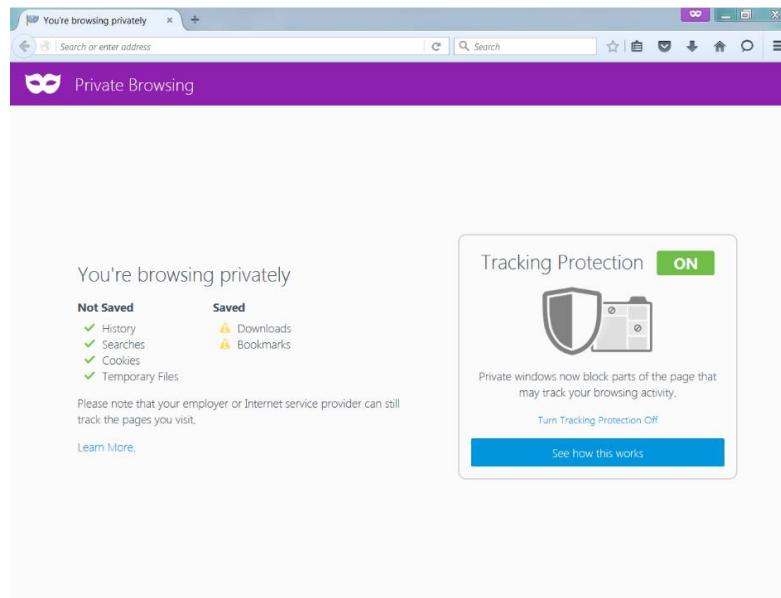
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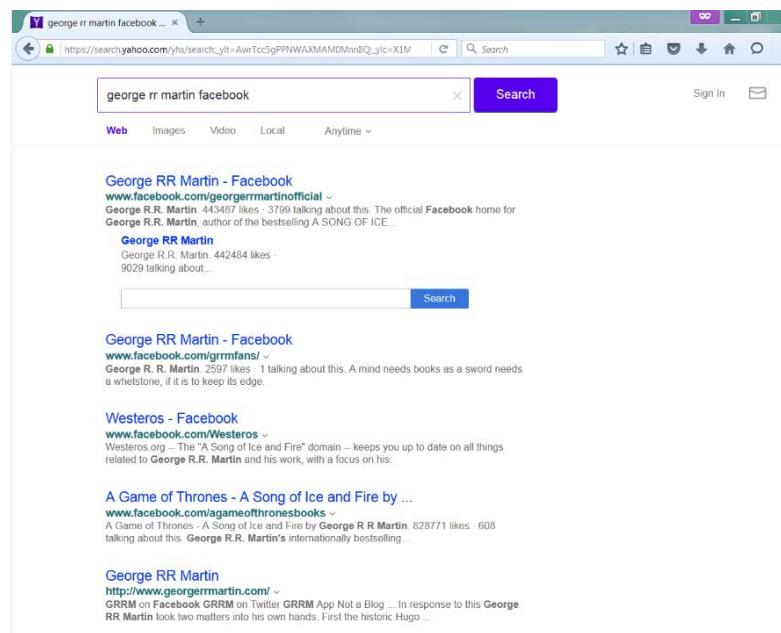
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1 Oracle responds to the Court's Request for Further Clarification as follows:

2 Oracle will not conduct any logged-in Facebook searches whatsoever. Oracle proposes to
 3 conduct Facebook-related searches, if any, using public Internet search engines only. An
 4 example is depicted below:



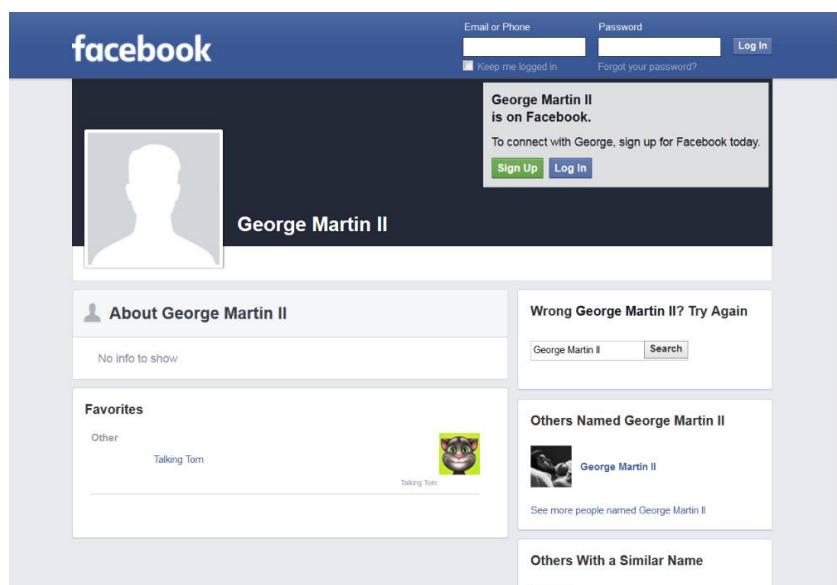
16 First, the person conducting the search would, while not logged into Facebook, enter the
 17 search subject's name and the search term "Facebook" into a public Internet search engine such
 18 as Yahoo:



1 Second, the person conducting the search would click on search results returned by the
 2 public search engine that appear to be potentially relevant to the search query in order to view
 3 public information only. In some cases, depending on how the user has configured their account,
 4 timeline and other information may be visible:



17 In other cases, less information is publicly available as depicted in the example below:



1 Under no circumstances will any searches be conducted by persons logged into Facebook.
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3 Dated: March 23, 2016

4 ORRICK, HERRINGTON & SUTCLIFFE
5 LLP

6 By: /s/ Peter A. Bicks
7 PETER A. BICKS

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